

United States District Court

DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

v.

ANTHONY MARK BRISCOE

Criminal Complaint

CASE NUMBER: 06- 88M

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 20, 2006 in New Castle County, in the District of Delaware, defendant did knowingly possess with intent to distribute more than fifty grams of cocaine base, a/k/a crack cocaine, in violation of Title 21 United States Code, Section(s) 841(a)(1) & (b)(1)(A).

I further state that I am a(n) Special Agent and that this complaint is based
Official Title
on the following facts:

See attached Affidavit

Continued on the attached sheet and made a part hereof: Yes

SA D.B. Hughes
Signature of Complainant
David Hughes
Special Agent

Sworn to before me and subscribed in my presence,

July 21, 2006 at Wilmington, DE
Date City and State

Honorable Joseph J. Farnan, Jr.
United States District Judge
Name & Title of Judicial Officer

Joseph J. Farnan, Jr.
Signature of Judicial Officer



AFFIDAVIT

DAVID B. HUGHES, being duly sworn, states as follows:

1. I am a Special Agent with the Drug Enforcement Administration (DEA) and have been so employed for approximately five and one-half years. Prior to my employment with the DEA, I was employed as a Trooper with the Maryland State Police for approximately six years. During my law enforcement tenure, I have participated in numerous investigations into the unlawful distribution of narcotics in violation of federal and state laws. In the course of my duties, I have conducted or participated in physical and electronic surveillance, undercover transactions, the execution of search warrants, debriefing of informants, interviews of witnesses, reviews of tape-recorded conversations involving drug trafficking activities, and analyses of telephone toll records and other records kept by or relating to drug traffickers. Through my training, education and experience, I have become familiar with methods in which illegal drugs are imported, manufactured and distributed; methods of payment for such drugs; and methods used by drug traffickers to avoid law enforcement detection, including methods used to disguise the source and illegal nature of drug proceeds. I have also testified as an expert witness in federal and state courts regarding the distribution, transportation and concealment of illegal drugs.

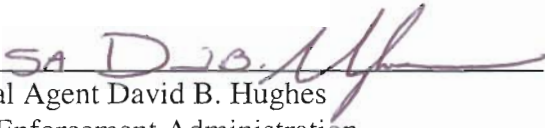
2. This Affidavit is in support of a criminal complaint against Anthony Mark BRISCOE. I am the case agent responsible for the investigation in aid of which this application is being made. This Affidavit is based on my personal knowledge and observations as well as information provided to me by other law enforcement officers. Because this Affidavit is solely for the purpose of establishing probable cause, not all facts relating to the investigation are included herein.

3. On or about July 19 and July 20, 2006, Agents/Officers of the DEA Wilmington, Delaware, Resident Office conducted an investigation, during the course of which a Confidential Source (hereinafter referred to as the "CS"), acting under the direction and control of the DEA, initiated a series of consensually monitored and tape-recorded telephone calls to BRISCOE regarding the purchase and delivery of two ounces of crack cocaine. During these calls, BRISCOE agreed to meet with and deliver two ounces crack cocaine to the CS at 11:00 a.m., in the 1200 block Claymont Street, Wilmington, Delaware.

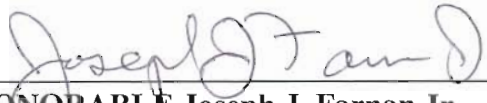
4. Subsequently, at approximately 10:30 a.m., Agents/Officers established surveillance in and around the area of the 1200 block of Claymont Street, Wilmington, Delaware, awaiting the arrival of BRISCOE. At approximately 11:02 a.m., Agents/Officers observed BRISCOE arrive in the 1200 block of Claymont Street, Wilmington, Delaware and park southbound on Claymont Street, Wilmington, Delaware adjacent to the CS. BRISCOE was the driver and lone occupant of a blue Chevrolet Impala. At approximately 11:03 a.m., Agents/Officers observed the CS meet with BRISCOE. At that time, Agents/Officers placed BRISCOE under arrest. A search of the Chevrolet Impala incident to arrest revealed approximately two ounces of crack cocaine (56.4 net grams) and approximately a quarter ounce of powder cocaine (7.6 net grams) inside the vehicle.

5. All of the suspected crack cocaine and powder cocaine noted above field-tested positive for the presence of cocaine. Based upon my training, knowledge and experience, I believe that the seized substances noted above are crack cocaine and powder cocaine. This conclusion is based on factors including the color, texture, smell, and appearance of the substances.

6. Based on the foregoing facts, I submit that there is probable cause to believe that Anthony Mark BRISCOE has committed violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), possession with intent to distribute more than fifty grams of a mixture and substance containing a detectable amount of cocaine base.


Special Agent David B. Hughes
Drug Enforcement Administration

Sworn to and subscribed before
me this 21st day of July 2006.


HONORABLE Joseph J. Farnan Jr.
United States District Court
District of Delaware